

1 MR. DYGERT: So basically, just so I'm
2 clear what your proposal is, you would conduct
3 examination on III-5 now, have no cross-examination
4 for VII-8. That would be all we needed, all you
5 needed to have Mr. D'Amico be able to respond to,
6 so he would then go on to be crossed by the
7 petitioners, and then we would pick up the
8 remainder of these issues afterwards?

9 MR. OATES: Yes. Pick up I-5 and I-6 for
10 which Mr. Pitterle is the witness, and issue V-8
11 with Mr. D'Amico and/or Mr. Albert in the--along
12 with issue V-1 and subpanel five of the network
13 architecture.

14 MR. HARRINGTON: And IV-35?

15 MR. OATES: IV-35, I believe, is really
16 related to issue I-5, I think. Isn't it?

17 MS. KELLEY: If I could, in terms of
18 deciding how much we can get through today and
19 whether or not to excuse Dr. Collins, it was
20 pointed out to me correctly that one of my network
21 architecture witnesses was going to respond to the
22 drawing, and was prepared to do so, and I asked him

1 to stick around until this panel was done, because
2 he won't need to come back for the rest of the week
3 because we're done with network architecture for
4 the week. So maybe once we are done with these few
5 issues that we're are trying to accommodate
6 Mr. D'Amico with, we could slip him in, and let him
7 respond to that and get out of here, that would be
8 very helpful.

9 MR. DYGERT: Okay. So, Mr. Oates,
10 whenever you're ready.

11 MR. HARRINGTON: Are we excusing the two
12 witnesses that are not involved in this issue from
13 the panel at this point?

14 MR. DYGERT: Yes.

15 (Off the record.)

16 MR. DYGERT: So, it seems to us that what
17 makes the most sense is, I think, do cross for both
18 sides on issue III-5. Then WorldCom can have its
19 witness respond to the drawing that Verizon
20 provided earlier this afternoon, or this morning,
21 whenever it was, and I think at that point we will
22 be prepared to break for the day, and so that means

1 that Dr. Collins and Mr. Kirchberger can be excused
2 for now, and we will resume with them and everyone
3 else who wants to talk about the remaining
4 intercarrier compensation issues tomorrow morning
5 at 9:30.

6 MR. HARRINGTON: Thank you.

7 MR. OATES: I would like to start with
8 Mr. Talbott, if I might.

9 MR. TALBOTT: Good afternoon, Mr. Oates.

10 MR. OATES: If I could, sir, I'd like to
11 refer you first to page 105, pages 105 and 106 of
12 your direct testimony; I believe this is AT&T
13 Exhibit 3. I'm working off of the version that
14 only has your name on it, so perhaps it's a
15 different page on the revised version.

16 The question is, do AT&T switches in
17 Virginia cover a geographic area comparable to the
18 area covered by each Verizon switch?

19 MR. TALBOTT: Yeah, I see that question.

20 MR. OATES: And the questions I have
21 relate to your response to that question below.
22 You respond on, beginning with AT&T com, continuing

1 through TCG and Media One that AT&T com has the
2 ability to connect to virtually any qualifying
3 local exchange customer in Virginia. TCG is able
4 to connect to virtually any customer in the LATA,
5 and Media One, again using a classified switch, is
6 able to connect.

7 What evidence, Mr. Talbott, does AT&T
8 offer in support of those--that statement? Are
9 those statements regarding the capabilities of the
10 AT&T switches?

11 MR. TALBOTT: We offered into evidence the
12 maps attached to my testimony.

13 MR. OATES: And those were exhibits DLT
14 Exhibits 8(a) through 8(d), I believe?

15 MR. TALBOTT: Yes, it was.

16 MR. OATES: Have you offered any other
17 evidence, has AT&T offered any other evidence in
18 support of the proposition that you stated
19 regarding the capability of the AT&T switches.

20 MR. TALBOTT: The evidence that's also in
21 the record, in my written testimony.

22 MR. OATES: Now, Mr. Talbott, is it

1 correct to say that the geographic comparability
2 test--that is, the test regarding whether an AT&T
3 switch serves an AT&T end office switch serves an
4 area that is geographically comparable to a Verizon
5 tandem, that's a test that was derived by the FCC,
6 was it not?

7 MR. TALBOTT: Yeah, was promulgated in a
8 Rule 51.711 A-3, I believe.

9 MR. OATES: In other words, it's not a
10 Verizon proposal. It's a Commission rule?

11 MR. TALBOTT: Yes.

12 MR. OATES: Now, if an AT&T switch and
13 AT&T end office switch serves a single local
14 customer, would it be AT&T's position, rather, that
15 that switch serves a geographically comparable area
16 to the Verizon tandem?

17 MR. TALBOTT: Based on the evidence that I
18 presented, if, for example, any one of the switches
19 served just a single customer, based on the
20 evidence I have provided, that calls terminate to
21 that one customer should be compensated at the
22 tandem rate.

1 MR. OATES: And why is that?

2 MR. TALBOTT: Because AT&T's switch and
3 the network supporting that switch, when the second
4 customer comes on could be anywhere in that LATA,
5 and anywhere in that comparable area, area
6 comparable to the Verizon tandem, and by meeting
7 that test, AT&T should be compensated for its costs
8 to carry Verizon's traffic, and the FCC is
9 determined that Rule 51.711 is the proxy by which
10 we would be entitled to the tandem rate.

11 MR. OATES: And the rule you just cited is
12 triggered only when the AT&T switch serves a
13 geographically comparable area to the Verizon
14 switch; isn't that right?

15 MR. TALBOTT: You said serves an area or
16 is designed to serve?

17 MR. OATES: Serves.

18 MR. TALBOTT: Serves. We may quibble
19 about the word "serve."

20 MR. OATES: Have I misstated the rule as
21 you would view it?

22 MR. TALBOTT: We could look at the rule,

1 if you like.

2 MR. OATES: Let me refer to you page 104
3 of your direct testimony again in Exhibit 3 where I
4 believe you quote from the Commission in the NPRM,
5 which is discussing Rule 51.711.

6 Do you see that part of your testimony?

7 MR. TALBOTT: Beginning on line three?

8 MR. OATES: Yes.

9 MR. TALBOTT: Yes.

10 MR. OATES: And beginning on line appears
11 should be 11 of that quote, again where AT&T is
12 quoting the Commission from the NPRM, it says: "We
13 can confirm that a carrier demonstrating that its
14 switch serves a geographically comparable area to
15 that served by the ILEC tandem switch is entitled
16 to the tandem interconnection right.

17 MR. TALBOTT: Yes, I see that.

18 MR. OATES: Is that what triggers AT&T's
19 right to the tandem rate, then, when it switch
20 serves a geographically comparable area?

21 MR. TALBOTT: I would like to go back to
22 Rule 51.711 if that has got the identical wording.

1 Let's see what it says.

2 I'm reading from the Code of Federal
3 Regulations where a switch of a carrier other than
4 an incumbent LEC serves a geographic area
5 comparable to the area served by an incumbent LEC's
6 tandem switch, the appropriate rate for the carrier
7 other than the incumbent LEC is the incumbent LEC's
8 tandem interconnection rate.

9 MR. OATES: Thank you.

10 Now, on your testimony again, in your
11 direct testimony, Mr. Talbott, Exhibit 3, page 110,
12 starting at line 17--do you have that in front of
13 you?

14 MR. TALBOTT: Yes, I do.

15 MR. OATES: The testimony, that sentence I
16 have starting on line 17 is, "Yet if a CLEC has a
17 single customer in a certain area, the CLEC incurs
18 costs to terminate Verizon traffic directed to that
19 customer."

20 Is it AT&T's position that the--that the
21 costs involved in terminating that call are what
22 warrant the tandem rate?

1 MR. TALBOTT: The basis for the rule is to
2 determine what should be the appropriate rate for
3 the CLEC to be compensated at, and the FCC is
4 determined that there is a proxy--in other words,
5 there is a good, reasonable accommodation of what
6 that rate should be, so long as the rule is met.

7 So, meeting the rule then means that the
8 best estimation for AT&T's costs would be the
9 Verizon tandem rate.

10 MR. OATES: But is it accurate to say that
11 you don't meet or fail to meet the rule on the
12 basis of cost? Cost is not what determines whether
13 the rule has been met, in other words.

14 MR. TALBOTT: That is correct. If AT&T
15 believed that it was being inadequately
16 compensated--and I believe the rules also provide
17 that AT&T could make a cost showing that it would
18 require a higher rate to determine--it would be
19 entitled to a higher rate to terminate Verizon's
20 traffic.

21 MR. OATES: Would you agree that no matter
22 what AT&T's costs are to terminate that call, AT&T

1 is not entitled to the tandem rate unless its
2 switch serves a geographically comparable area to
3 the Verizon tandem?

4 MR. TALBOTT: That's my reading of the
5 rule.

6 MR. OATES: Mr. Talbott, let me refer to
7 you your Exhibits 8(a) through (d), which were
8 offered with your direct testimony. Labeled
9 Exhibit DLT 8(a) through 8(d).

10 Do these--well, these exhibits show the
11 location of the various AT&T affiliate switches; is
12 that right? In Virginia.

13 MR. TALBOTT: Yes, and the rate centers
14 that those switches by which we offer--the rate
15 centers to which we offer services by those
16 switches.

17 MR. OATES: And the maps show the area,
18 the geographic area over which the switches are
19 capable of providing service; is that right?

20 MR. TALBOTT: To which we would take a
21 customer order, if a customer requested service
22 from one of those rate centers, yes.

1 MR. OATES: But those diagrams do not show
2 the location or number of customers actually served
3 by any of those switches, do they?

4 MR. TALBOTT: No, they do not.

5 MR. OATES: If I could move now to the
6 WorldCom witness, Mr. Grieco, is that how you
7 pronounce your name?

8 MR. BALL: I'm Mr. Ball.

9 MR. OATES: Oh, you're Mr. Ball. Mr.
10 Grieco's not here. Okay, thank you. And, Mr.
11 Ball, perhaps I can do this just in summary
12 fashion. WorldCom has also offered a description
13 of its switches. I don't believe you've offered
14 any exhibits, but a description of the location of
15 its switches in Virginia, and a description of the
16 rate centers, the local serving areas over which
17 those switches are capable of providing service; is
18 that right?

19 MR. BALL: Yes.

20 MR. OATES: Has WorldCom offered any
21 evidence regarding the number or location of
22 customers served by any of those switches?

1 MR. BALL: No.

2 MR. OATES: Do you agree with
3 Mr. Talbott's testimony a minute ago that the costs
4 incurred by Verizon to terminate a call are not
5 what determines whether or not Verizon is entitled
6 to recover the tandem rate under this issue, but
7 rather--I'm sorry, WorldCom is entitled to recover
8 the tandem rate, but rather WorldCom is entitled to
9 recover the tandem rate only when its end office
10 switch covers a geographically comparable area to
11 the Verizon tandem?

12 MR. BALL: I feel like I'm listening to a
13 CD that has a skip in it.

14 MR. OATES: I haven't been in the hearing
15 long enough to have any excuses either.

16 Let me rephrase that.

17 Do you agree there is no cost component to
18 the Commission's rule with regard to the
19 appropriate reciprocal compensation rate that's at
20 issue under issue III-5?

21 MR. BALL: Yes.

22 MR. OATES: Whether the FCC presumption is

1 triggered is based solely on whether in your case
2 the WorldCom switch serves a geographically
3 comparable area to the Verizon tandem? Is that
4 right?

5 MR. BALL: Yes, assuming you adequately
6 paraphrased what the rule says.

7 MR. OATES: Okay. I have no further
8 questions.

9 (Off the record.)

10 MR. DYGERT: Mr. D'Amico.

11 Would you introduce yourself, and I will
12 remind you are still under oath.

13 MR. D'AMICO: My name is Pete D'Amico with
14 Verizon.

15 CROSS-EXAMINATION

16 MS. SCHMIDT: Good afternoon, Mr. D'Amico.

17 MR. D'AMICO: Good afternoon.

18 MS. SCHMIDT: On page 26 of your direct
19 testimony, which is the intercarrier comp testimony
20 on nonmediated issues, and I apologize, I don't
21 have the exhibit number for that one.

22 MS. FARROBA: Does anyone know what that

1 exhibit is?

2 MR. OATES: That's Verizon Exhibit 5.

3 MS. SCHMIDT: Thank you.

4 On page 26 of your testimony, which is
5 Exhibit Verizon 5, you indicate that CLECs should
6 be required to demonstrate actual functional and
7 geographic comparability for each of their
8 switches.

9 Are you therefore asserting that Rule
10 711.A.3 requires an examination of the
11 functionality of the CLEC switch as well as the
12 geographic coverage?

13 MR. D'AMICO: Hold on a second. I'm
14 trying to find the line.

15 Okay, this is near the bottom where it
16 says CLECs should be required to demonstrate actual
17 functionality or functional and geographic
18 comparability for their switch?

19 MS. SCHMIDT: That's correct, yes.

20 MR. D'AMICO: I think, based on what we
21 had just talked about or what I just heard, we read
22 what the order said, and I think what this is

1 trying to address is what is actually happening or
2 what should be happening. But as far as reading
3 the actual order, it would be based on serving that
4 geographic area.

5 MS. SCHMIDT: Okay, so you agree that the
6 standard is geographic coverage as opposed to
7 functionality; correct?

8 MR. D'AMICO: Yes.

9 MS. SCHMIDT: Okay. Now, with respect to
10 the geographic coverage test, you state on page 27
11 of your direct, which is Exhibit Verizon 5, that a
12 CLEC must prove that their switches actually serve
13 a geographically dispersed area.

14 Have you proposed in your testimony how
15 the FCC should determine whether a switch actually
16 serves an area that's geographically comparable to
17 the area served by Verizon switches?

18 MR. D'AMICO: No, I have not.

19 MS. SCHMIDT: Well, let's talk about--what
20 do you believe the relevant considerations would
21 be? Would it be number of customers, location of
22 the customers? Would those things be relevant, in

1 your opinion?

2 MR. D'AMICO: I think they would. I just
3 don't know the formula or the combination for how
4 it should be done.

5 MS. SCHMIDT: So, you're proposing a test
6 but you don't have a proposal as to how that test
7 should be implemented by the FCC, then?

8 MR. D'AMICO: I would say that one
9 customer seems--I'm not sure if it's appropriate to
10 just have one customer in a given area, but if you
11 were to ask me should it be 10 or 20 or 40, I don't
12 have a feel for that.

13 MS. SCHMIDT: You don't know. Okay.

14 So, there could be a lot of possible
15 examples that you could look at in terms of how
16 many customers and where are these customers
17 dispersed. I mean, there could be a variety of
18 combinations that could be considered; correct?

19 MR. D'AMICO: Yes.

20 I guess also you would have to look at
21 again the ILEC tandem and what area it serves, and
22 is there--is the CLEC office functioning or serving

1 as a tandem, covering that area with customers?

2 MS. SCHMIDT: All right, okay.

3 Do you agree that the number of customers
4 and the dispersion of customers for new entrants
5 could change over time?

6 MR. D'AMICO: Yes.

7 MS. SCHMIDT: So, at some point in time a
8 CLEC might not meet whatever test was established
9 but then later in time they may meet the test,
10 whatever the test is that's established; isn't that
11 correct?

12 MR. D'AMICO: Again, depending on the
13 parameters of the test, yes.

14 MS. SCHMIDT: On page 28 of your
15 testimony, which is Verizon Exhibit 5, you state
16 even if a CLEC switch meets the tandem criteria as
17 you describe it, you nevertheless state that the
18 CLEC should not receive the tandem rate; is that
19 correct?

20 MR. D'AMICO: Can you point me to a
21 specific line, please.

22 MS. SCHMIDT: Lines seven through nine.

1 MR. D'AMICO: Yes, I see that. Could you
2 go back over that question, please.

3 MS. SCHMIDT: Okay. You're stating that
4 even if a CLEC switch meets the tandem criteria
5 that you described, you still are proposing that
6 the CLEC should not receive the tandem rate; isn't
7 that correct?

8 MR. D'AMICO: Well, I think what we are
9 proposing is that there be some kind of blend
10 established based on how much traffic the CLEC is
11 sending to Verizon via the tandem versus the end
12 office.

13 MS. SCHMIDT: So, are you suggesting that
14 the FCC change or amend or rescind the 7.11.A.3
15 rule in this case?

16 MR. D'AMICO: No, I'm not.

17 MS. SCHMIDT: Is your proposal consistent
18 with the 7.11.A.3 rule?

19 MR. D'AMICO: Yes.

20 MS. SCHMIDT: How is that?

21 MR. D'AMICO: Well, again, it's
22 addressing--the FCC rule is addressing, is it

1 serving customers in that area, comparable to an
2 ILEC tandem.

3 What this is proposing really is
4 addressing more of a fairness situation, where a
5 CLEC has the option of getting the lower end office
6 rate and Verizon does not have that capability, so
7 I wouldn't say that it's changing or in conflict
8 with it.

9 MS. SCHMIDT: Okay. AT&T and Verizon have
10 agreed to use one-way trunks, haven't they?

11 MR. D'AMICO: Yes, I believe.

12 MS. SCHMIDT: So AT&T could choose to
13 deliver its traffic to Verizon's tandem or to
14 Verizon's end office; isn't that correct?

15 MR. D'AMICO: Yes.

16 MS. SCHMIDT: Now, these choices will
17 affect how the AT&T traffic is routed to Verizon,
18 but given the use of one-way trunks, they will not
19 necessarily affect how Verizon's traffic is routed
20 to AT&T; is that correct?

21 MR. D'AMICO: Correct.

22 MS. SCHMIDT: Thank you. I have no

1 further--I'm sorry.

2 I guess I need a clarification. Are we
3 doing more than just III-5 now? I'm a little
4 confused.

5 MR. DYGERT: Not now. Not at this point.

6 MS. SCHMIDT: Then I'm done, thank you.

7 MS. KELLEY: Nothing from WorldCom.

8 QUESTIONS FROM STAFF

9 MS. PREISS: For the Verizon witness,
10 Mr. D'Amico, is it Verizon's position that AT&T and
11 WorldCom switches in Virginia do not meet the
12 geographic comparability test set forth in the
13 Commission's rule?

14 MR. D'AMICO: I guess I'm not in a
15 position to know. I have looked at or seen the
16 exhibits, and it shows kind of an overlay of maps
17 of serving area, but again, I'm not sure what the
18 criteria should be as far as serving that area, how
19 many customers or what the parameter should be.

20 So, I think what we are saying is let's
21 not just assume that it's always the tandem rate
22 that there needs to be--they should need to serve

1 that area.

2 MS. PREISS: But language that says that
3 they are entitled to the tandem rate if they serve
4 the geographic area comparable to the Verizon
5 tandem is sufficient for Verizon?

6 MR. D'AMICO: Well, I think there needs to
7 be, I guess, a definition--not a definition, but
8 some meat put around serves.

9 MS. PREISS: But Verizon hasn't proposed
10 any such test?

11 MR. D'AMICO: No.

12 MR. MOON: Paul Moon, FCC.

13 When I heard the cross-examination of
14 WorldCom, WorldCom seemed to have a different show
15 of proof for its geographic coverage than AT&T has
16 offered. AT&T seems to have given, for example,
17 the graphical diagrams and so forth.

18 Could you clarify to what extent WorldCom,
19 in this proceeding, has proven that its geographic
20 coverage is comparable to Verizon's with regard to
21 tandem service.

22 MR. BALL: On page 75 of our direct

1 testimony, we provided information comparing the
2 coverage of the 11 rate centers where we have
3 obtained NXX codes that we are serving with two
4 switches as compared to the number of tandem
5 switches that Verizon serves those same 11 rate
6 centers. And Verizon serves those areas with more
7 than two tandems.

8 MS. PREISS: Just to clarify for the
9 record, that's WorldCom Exhibit 3?

10 MS. KELLEY: We are looking for our
11 exhibit list.

12 MR. BALL: I think I remember it being
13 Exhibit 3 from earlier.

14 MS. PREISS: Okay.

15 MR. MOON: Would you characterize that as
16 distinguishable from AT&T's approach of proving out
17 its geographic coverage?

18 MR. BALL: I'm actually not that familiar
19 with AT&T's presentation.

20 MR. MOON: Then I would like to turn to
21 ask Mr. Talbott, if he could contrast his approach
22 to that of WorldCom.

1 (Off the record.)

2 MR. BALL: I believe we are taking the
3 same approach. We just gave a written
4 representation, and AT&T provided a graphical
5 representation.

6 MR. MOON: Thank you.

7 This question now goes to Verizon.
8 Verizon appears to be arguing that one of the
9 reasons that this is contentious is because of the
10 lack of a competitive option to be able to bypass
11 the tandem rate and use the end office rate. Part
12 of the reason that this occurs is apparently
13 because CLECs oftentimes combine end office
14 switching and tandem switching functionality, and
15 so my question about Verizon's network is to what
16 extent does Verizon also likewise combine end
17 office switching and tandem switching and to what
18 extent is that implemented in comparison to the
19 pure end office and pure tandem switching
20 functionality?

21 MR. D'AMICO: To my knowledge, the Verizon
22 network is set up where we have tandems and we have

1 end office that subtend those tandems. I wish Don
2 was here; he might be able to help me with some of
3 this stuff, Don Albert.

4 But I have seen like DMS 100/200 switch,
5 but I believe that is a tandem at an end office,
6 but there are two parts of the switch, and so you
7 either connect to the end office part of the switch
8 or to the tandem part of the switch. So I don't
9 know of any situations where we in effect have--you
10 can't get to one or the other, in other words.

11 MR. MOON: Can a CLEC, in turn--does a
12 CLEC ever encounter the problem of having to pay
13 the tandem rate and not being able to go with the
14 end office rate because of the fact that Verizon
15 switches combine end office and tandem switching?

16 MR. D'AMICO: No, not to my knowledge.
17 Clearly you could go to the tandem; or, when the
18 usage is great enough, they go directly to the end
19 office.

20 MR. MOON: Another question to Verizon,
21 it's a short one, is with regards to what you were
22 saying earlier about geographically dispersed

1 service, are you creating yet another test, so to
2 speak, or would you articulate this as yet another
3 way of proving out what is in the rule this term
4 service--serving?

5 MR. D'AMICO: I guess maybe both. I mean,
6 the rule is what it is, but I think there needs to
7 be something put around the issue of if the CLEC is
8 actually serving customers there, and how is that
9 worked out, as opposed to just a broad brush that
10 says look, I have the potential to serve anybody in
11 this LATA, but they may not actually be doing that.

12 So, that's--

13 MR. MOON: So Verizon could accept the
14 rule in a vacuum and just take the rule for what it
15 is, and then in the process of proving out that
16 resume, the incorporating concepts like
17 geographically dispersed and so forth to show
18 service or that's at least Verizon's
19 interpretation?

20 MR. D'AMICO: Yes.

21 MR. MOON: Okay.

22 MS. PREISS: To AT&T and WorldCom, so,

1 forgive me if I'm going over territory that is
2 covered in your testimony, but it's your position
3 that all your switches in Virginia are--serve areas
4 geographically comparable to Verizon's tandem
5 switches? WorldCom first.

6 MR. BALL: Yes.

7 MS. PREISS: AT&T.

8 MR. TALBOTT: Yes.

9 MS. PREISS: So, then there is no point
10 then on your networks to which Verizon could
11 deliver its traffic and avoid paying the tandem
12 rate and pay the end office rate only. They would
13 always have to pay the tandem rate; is that
14 correct, Mr. Ball?

15 MR. BALL: Yes.

16 MS. PREISS: Mr. Talbott?

17 MR. TALBOTT: Yes.

18 MS. PREISS: Thank you.

19 MR. MOON: No further questions, except
20 for this late coming one. Just a moment, please.

21 (Pause.)

22 MS. PREISS: This is belts and suspenders

1 and buttons and snaps and pins, but just to be
2 absolutely sure, the tandem switching rate, we are
3 talking about applicability of the tandem rate,
4 AT&T and WorldCom, you were only talking about
5 traffic to which reciprocal compensation applies;
6 is that correct?

7 MR. BALL: Yes.

8 MR. TALBOTT: Yes.

9 MS. PREISS: Thanks.

10 MR. DYGERT: Any redirect from any of the
11 parties?

12 MR. OATES: I have no redirect. I have a
13 point of clarification I would like to make, if I
14 might, simply in response to a question Ms. Preiss
15 asked, which is essentially what is Verizon's
16 position on the issue, and our position is that
17 that neither AT&T nor WorldCom have proven
18 geographic comparability.

19 MS. PREISS: Excuse me, are you testifying
20 here?

21 MR. OATES: No, ma'am. It's my
22 understanding that what you asked the witness what

1 was our position on a particular point of argument,
2 and I'm just simply trying to clarify that.

3 MS. PREISS: If you could do it in under
4 30 seconds, go ahead.

5 MR. OATES: I think I have done it. I
6 don't need to say any more. It is that, yes, our
7 position is that they have failed to establish or
8 set forth facts that proved they have met the tests
9 set out by the FCC regarding geographic
10 comparability.

11 MR. DYGERT: Mr. Keffer?

12 MR. KEFFER: No.

13 MR. DYGERT: Anything other redirect?

14 MS. KELLEY: Nothing from WorldCom.

15 MR. DYGERT: So, I think that's it for
16 this panel for this evening.

17 MS. KELLEY: Mr. Grieco with our--

18 (Off the record.)

19 MR. DYGERT: All right. I think at this
20 point both AT&T and WorldCom's witnesses would like
21 to respond briefly to the diagram that Mr. Albert
22 drew earlier, which I believe will ultimately be

1 reduced to 8-1/2 by 11 form as Exhibit 53 for
2 Verizon?

3 MR. EDWARDS: I believe that's correct.

4 MR. DYGERT: So, who would like to go
5 first? Mr. Talbott.

6 CROSS-EXAMINATION

7 MR. TALBOTT: Mr. Albert, in his diagram,
8 was asserting that a single POI in the LATA was
9 going to create substantial network problems for
10 Verizon, and I would like just to take a minute to
11 tell you why that that's not the case. And to do
12 so, we need to distinguish the difference between
13 trunking and where a POI would number the network.

14 If I'm going to use this diagram right
15 here to suggest that AT&T, under its right, should
16 be able to have a single POI in the LATA, and I
17 would like to hypothetically--

18 MR. DYGERT: Is this going to be yet
19 another new exhibit? Is there any way you can do
20 what you're talking about on Verizon 53 instead
21 of--just verbally doing it instead of drawing on
22 it.

1 MR. TALBOTT: I would rather use what
2 would be a much more clear and simple diagram.

3 MR. DYGERT: Will you give us this as an
4 exhibit?

5 MR. KEFFER: When he's done, we will do
6 the same thing we did with 31 to 34, we'll reduce
7 it by eight and a half by 11, and Mr. Talbott, be
8 sure you indicate clearly what points on the
9 diagram you're referencing during your remarks.

10 MR. TALBOTT: In this hypothetical
11 example, AT&T may have a co-location cage or
12 arrangement at this Verizon tandem. That would be
13 our single POI within the LATA.

14 MR. DYGERT: That's the Verizon tandem in
15 city A for purposes of clarity.

16 MR. TALBOTT: For city A.

17 What Mr. Albert suggested was that unless
18 there was interconnection to all the tandems in the
19 LATA, that was going to create a network problem
20 for Verizon; and I would like to show you that from
21 this single POI, AT&T could have direct trunking or
22 trunking to each of the other tandems.